

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

FILED  
IN CLERKS OFFICE

2006 APR -7 P 2:11

UNITED STATES OF AMERICA

V.

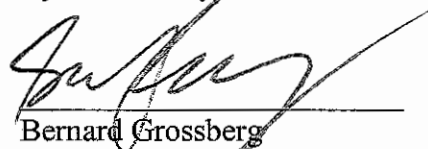
ANTHONY BUCCI, ET. AL.

Criminal No. 04-10194-RCL  
DISTRICT OF MASS.

**MOTION TO RELEASE WITNESS BRYAN RAFTERY**

The witness, Bryan Raftery, moves this Court to order that he be released from the custody of the United States Marshalls Service. In support of this motion, the witness states that after hearing on March 31, 2006, he was found by this Court, Lindsay, J., to be in civil contempt of court for his refusal to testify and was committed to the custody of the United States Marshalls Service. Imprisonment for civil contempt may not continue beyond the time when the ordered testimony is useful and "No period of such confinement shall exceed the life of --- (1) the court proceeding...". 28 U.S.C. §1826(a) Given the fact that the trial of the above-entitled matter has concluded, the witness must be released forthwith.

Respectfully submitted  
By his attorney,



Bernard Grossberg  
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Suite 1800  
Boston, MA 02110  
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CERTIFICATE OF SERVICE

I, Bernard Grossberg, hereby certify that on this 7th day of April, 2006, I have served a true copy of my **Motion To Release Witness Bryan Raftery** upon Assistant United States Attorneys S. Theodore Merritt, Esq. and John McNeil, Office of the United States Attorney, One Courthouse Way, Boston, MA 02210; and upon Michael Natola, Esq., 63 Atlantic Avenue, Suite 2B, Boston, MA 02110 and upon Thomas Drechsler, Esq., Finneran, Byrne & Drechsler, 50 Redfield Street, Suite 201, Boston, MA 02122 by delivering same by pre-paid first class mail.

  
Bernard Grossberg